

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NORTHWEST IMMIGRANT RIGHTS
PROJECT,

Plaintiff,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT,

Defendant.

Case No. 2:25-cv-00083-RSL

JOINT STIPULATED MOTIOIN

Northwest Immigrant Rights Project (NWIRP) filed the above-captioned lawsuit under the Freedom of Information Act (FOIA), 5 USC § 552, against United States Immigration and Customs Enforcement (ICE) seeking the disclosure of certain documents. The parties have met and conferred in a good faith effort to try and resolve this matter without motions practice.

For the purposes of endeavoring to resolve this case without further litigation, the parties have stipulated and agreed to the following schedule and plan. The parties respectfully request that this Court enter an order approving the parties' agreement and schedule:

- Following the entry of an order from this Court, ICE will process the FOIA request at issue in this litigation at a rate of 750 pages and 30 minutes of video per month.

- 1 • Should there be any questions regarding any redactions or FOIA withholdings, and/or any
2 other issues, counsel for both parties will be available to meet and confer in good faith to try
3 and resolve any dispute without motions practice. However, Plaintiff reserves the right to
4 challenge the adequacy of any search or redactions.
- 5 • So that ICE may focus its resources on completing the processing of NWIRP's FOIA request,
6 the parties agree and stipulate that ICE need not file a responsive pleading while the parties
7 work to resolve this dispute. The parties further agree and stipulate that no discovery plan or
8 initial disclosures are needed in this FOIA case.
- 9 • Following the completion of ICE's FOIA response, the parties will meet and confer and within
10 30 days the parties will notify the Court if they have resolved their dispute or alternatively file
11 a status report identifying any remaining disputed issues and proposed briefing schedule for
12 motions practice.

13 Therefore, to conserve Court and party resources, the parties stipulate that there is good
14 cause for this Court to enter an order approving the parties' proposed plan for resolution of this
15 FOIA case. As noted, Plaintiff reserves the right to pursue further FOIA remedies if needed.

16 DATED this 19th day of March, 2025.

17 Respectfully submitted,

18 TEAL LUTHY MILLER
19 Acting United States Attorney

20 s/ Katie D. Fairchild

21 KATIE D. FAIRCHILD, WSBA No. 47712
22 Assistant United States Attorneys
23 United States Attorney's Office
24 Western District of Washington
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4073

Email: katie.fairchild@usdoj.gov

Attorneys for Defendants

I certify that this memorandum contains 327 words, in compliance with the Local Civil Rules

NORTHWEST IMMIGRANT RIGHTS PROJECT

s/Aaron Korthius

AARON KORTHUIS, WSBA No. 53974

MATT ADAMS, WSBA No. 28287

GLENDA M. ALDANA MADRID, WSBA No. 46787

LEILA KANG, WSBA No. 48048

615 Second Avenue, Suite 400

Seattle, WA 98104

Phone: 206-957-8611

Email: aaron@nwirp.org

matt@nwirp.org

glenda@nwirp.org

leila@nwirp.org

Attorneys for Plaintiff

ORDER

The parties having agreed, it is so ORDERED.

DATED this 20th day of March, 2025.



ROBERT S. LASNIK

United States District Judge